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November 6, 2015

VIA ECF

The Honorable Ronnie Abrams United States District Court Southern District of New York 40 Foley Square, Room 2203 New York, NY 10007

Re: Robert Solomon v. Flynn Family Office, LLC

and Focus Financial Partners, LLC, No. 15-CV-7426 (RA)

Dear Judge Abrams:

On October 29, 2015, the Court directed the parties in this action — which involves claims of hostile work environment, retaliatory termination and ERISA violations — to comply with the Pilot Discovery Protocols for Counseled Employment Cases. Pursuant to those Protocols, the parties are required to exchange documents by November 16, 2015.

On behalf of defendants, we contacted the Court's Alternative Dispute Resolution program of mediation and learned that the action has not yet been formally referred to mediation. To expedite that process, we ask that the Court "So Order" the attached proposed Mediation Referral Order. We have also emailed a copy of the proposed Order to the Orders and Judgments Clerk.

Respectfully submitted,

Gabrielle K. Genauer

cc: Walker G. Harman, Esq. (via ECF)

Counsel for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ROBERT SOLOMON,	
Plaintiff,	
v.	No. 15-CV-7426 (RA)
FLYNN FAMILY OFFICE, LLC and FOCUS FINANCIAL PARTNERS, LLC,	[PROPOSED] MEDIATION REFERRAL ORDER
Defendants.	
Pursuant to the Court's Amended Standing Administrative Order M10-468 dated May 24, 2015 (Preska, C.J.), this action is referred to the Court's Alternative Dispute Resolution program of mediation. SO ORDERED:	
Hon. Ronnie Abrams, U.S.D.J.	